

1 Michael R. Bracamontes (SBN 242655)
2 Ryan J. Vlasak (SBN 241581)
3 Kristen M. Ross (SBN 250917)
4 BRACAMONTES & VLASAK, P.C.
5 220 Montgomery Street, Suite 870
6 San Francisco, CA 94104
7 Phone: (415) 835-6777
8 Fax: (415) 835-6780
9 mbracamontes@bvlawsf.com

10 Attorneys for Plaintiff Chi Nguyen

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHI NGUYEN,

Plaintiff,

vs.

CLEAN HARBORS ENVIRONMENTAL
SERVICES, INC., *et al.*,

Defendants.

CASE NO.: 3-11-CV-00756-MMC

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE DISCOVERY AND MOTION
DEADLINES BY 30 DAYS; ORDER THEREON**

Motion To Be Decided on Papers

DEPT: Courtroom 7, 19th Floor
JUDGE: Hon. Maxine M. Chesney

ACTION FILED: February 18, 2011

TRIAL DATE: None

IT IS HEREBY STIPULATED AND AGREED by and among all parties that:

All deadlines related to motions, discovery, and expert witness reports shall be vacated and continued by 30 days.

A continuance of all deadlines is required because the second day of Plaintiff's deposition, the second day of Defendant's Human Resources Director's deposition, and the initial deposition of an important third-party witness, is not yet complete. Additionally, Plaintiff's counsel was contacted this morning by Plaintiff's retained human resources expert and was informed that she is working from her London office but is having Internet connectivity problems, cannot get a technician out for two days, and has misplaced two deposition transcripts that she intended to review prior to drafting her report.

Further, one of the percipient witnesses was out of state and in the process of moving, and it has

1 been difficult to schedule his deposition.

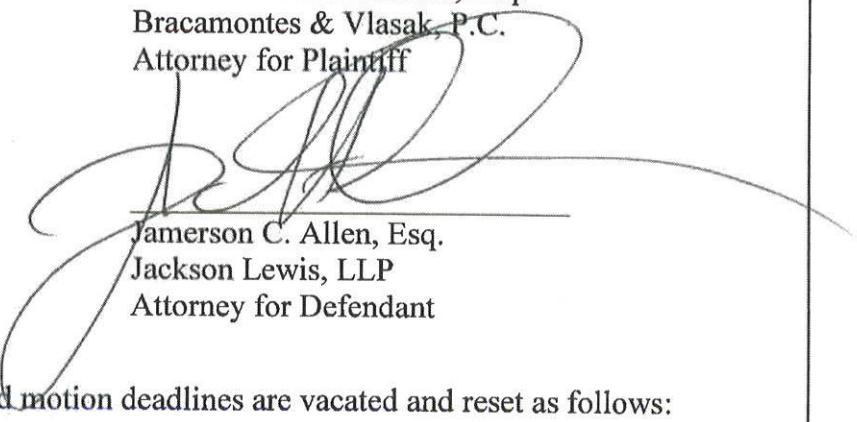
2 Additionally, there is another percipient witness who has been on extended medical leave and his
3 deposition may require multiple sessions in order to complete in light of his medical condition.
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5 IT IS SO STIPULATED AND AGREED.

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7 DATED: 9/12/12


Michael R. Bracamontes, Esq.
Bracamontes & Vlasak, P.C.
Attorney for Plaintiff

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11 DATED: 9/12/2012


Jamerson C. Allen, Esq.
Jackson Lewis, LLP
Attorney for Defendant

14 IT IS SO ORDERED that all discovery and motion deadlines are vacated and reset as follows:
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1. The parties shall serve and lodge expert witness reports by October 10, 2012.
2. The parties' deadline to file a Motion to Exclude Expert Witnesses shall be October 15, 2012.
3. The parties' deadline to disclose rebuttal expert witnesses shall be October 24, 2012.
4. The parties' deadline to file a Motion to Exclude Rebuttal Expert Witnesses shall be October 29, 2012.
5. The last day for a hearing on a party's Motion to Exclude an Expert Witness shall be November 16, 2012.
6. The last day for a hearing on a party's Motion to Exclude a Rebuttal Expert Witness shall be December 3, 2012. December 7, 2012.
7. The close of all fact discovery shall be November 13, 2012.
8. The last day for hearing dispositive motions is January 9, 2013. January 11, 2013.

27 Dated: September 19, 2012


Mafine M. Cheaney
Judge of the U.S. District Court